



September 17, 2008

DOW Management Company Inc d/b/a DOW Networks  
1000 Circle 75 Parkway Ste. 500  
Atlanta, GA 30339

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Suite TW-A325  
Washington, DC 20554

RE: Certification of CPNI Filing / EB Docket 06-36

Dear Ms. Dortch:

I hereby certify that DOW Management Company Inc d/b/a DOW Networks has established and adheres to policies and procedures to fully comply with the Federal Communications Commission's rules as laid out in section 64.2009 governing Customer Proprietary Network Information ("CPNI"). Enclosed please find the required certification and accompanying statement.

Should you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "David Wise", with a long, sweeping horizontal line extending to the right.

David Wise

Annual 47 C.F.R. S: 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: September 17, 2008

Name of company covered by this certification: DOW Management Company Inc d/b/a DOW Networks

Form 499 Filer ID: 821968

Name of signatory: David Wise

Title of signatory: CEO

I, David Wise, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. S: 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI. The company does not sell, use or disclose CPNI.

Signed:

  
David Wise

## STATEMENT

DOW Management Company Inc d/b/a DOW Networks understands the Federal Communications Commission's regulations regarding the protection, use and disclosure of customer proprietary network information ("CPNI"). DOW Networks has established operating procedures that ensure compliance with the regulations pertaining to CPNI.

- Employees are trained as to when they are and are not authorized to use CPNI and are made aware of the disciplinary penalty for any violation of unauthorized use of CPNI, which is termination from employment. DOW Networks adheres to a strict zero-tolerance policy.
- A system is in place to insure that all sales and marketing campaigns are approved by management.
- An executive committee is set up to review all outbound marketing situations before implementation and release.
- A system has been established to maintain a record of all sales and marketing campaigns that use CPNI, including marketing campaigns of affiliates and independent contractors. Detailed within this system is a description of each campaign, the specific CPNI used and what products and services are offered in the campaign. These records are maintained beyond the one (1) year minimum.
- Record of written notice to the FCC within five (5) business days of any instance where the opt-out mechanisms do not work properly, to such a degree that a consumers' inability to opt-out is more than an anomaly.
- Customer authentication methods are in place to insure adequate protection and disclosure of CPNI.
- A system is in place to notify customers of any change in access to CPNI.
- A protocol is in place to notify the appropriate Law Enforcement Agency ("LEA") for any unauthorized access to a customer's CPNI. Also, records of any discovered CPNI breaches are kept for a minimum of two (2) years.